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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

-----X
CHEYNE ANDERSON, JESUS CASTELLANO,
HANNAH MIRZA, KATHLEEN O'BEIRNE,
SETH TAYLOR, WILLIAM VAN DER LAAR,
MARK WESLEY DUDLEY, RACHEL WESTRICK,
JIAJUN XU, individually and on behalf of all others
Similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

-----X

Case No. 5:25-cv-03268-BLF

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER GRANTING
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

Date: January 22, 2026

Time: 9:00 AM

Dept.: Courtroom 1

Judge: Hon. Beth Labson Freeman

1 Pursuant to Local Rule 7-12, Plaintiffs Cheyne Anderson, Jesus Castellano, Hannah
 2 Mirza, Kathleen O'Beirne, Seth Taylor, William Van Der Laar, Mark Westley Dudley, Rachel
 3 Westrick, and Jiajun Xu ("Plaintiffs"), and Defendant Google LLC ("Defendant") (collectively,
 4 the "Parties") stipulate and respectfully request that the Court enter an order granting Plaintiffs
 5 leave to file a Second Amended Complaint, in the form attached to this Stipulation, and vacating
 6 the oral argument scheduled for January 22, 2026, in consideration of the following facts:

7 WHEREAS, on September 23, 2025, the Court approved the Parties' Joint Stipulation
 8 Continuing the Briefing Schedule on Plaintiffs' Motion for Leave to File an Amended Complaint
 9 (ECF No. 40), setting a deadline of September 24, 2025 for Plaintiffs to furnish "further
 10 proposed amendments to the operative complaint," and a deadline of October 3, 2025 for
 11 Defendant to "inform Plaintiffs as to whether it will stipulate to or oppose Plaintiff's proposed
 12 amendments;" and

13 WHEREAS, Plaintiffs provided Defendant a copy of the revised proposed Second
 14 Amended Complaint on September 24, 2025; and

15 WHEREAS, Defendant sent Plaintiffs' counsel an email on September 29, 2025
 16 stipulating Defendant's consent to Plaintiffs filing the revised proposed Second Amended
 17 Complaint;

18 NOW THEREFORE, in the interest of efficiency and preserving judicial resources, the
 19 Parties hereby jointly stipulate, agree, and respectfully request an Order as follows:

20 1. That Plaintiffs be granted leave to file the [Proposed] Second Amended Complaint
 21 approved by Defendant on September 29, 2025 and attached to this Stipulation;
 22 2. That the Clerk be ordered to file the [Proposed] Second Amended Complaint attached
 23 to this Stipulation.

1 3. That the deadline for Defendant to file a responsive pleading to the Second Amended
2 Complaint be set for thirty (30) days after the Second Amended Complaint is deemed
3 filed, as set forth in the Court's September 23, 2025 Order;
4 4. That the oral argument scheduled for January 22, 2026 on Plaintiffs' Motion for
5 Leave to Amend be vacated; and
6 5. That Defendant's October 2, 2025 deadline to answer or otherwise respond to the
7 First Amended Complaint (ECF No. 8) be vacated.

8 The Parties agree that this Stipulation will not affect any other scheduled dates, including
9 the case-management dates set by the Court's September 23, 2025 Order.

10 A Proposed Order is being filed in connection with this Stipulation.

11 Dated: October 2, 2025

12 Respectfully Submitted,

13 LEVY RATNER, P.C.

JONES DAY

14 By: /s/Aleksandr L. Felstiner

By: /s/Aaron L. Agenbroad

15 Aleksandr L. Felstiner

Aaron L. Agenbroad

16 *Attorneys for Plaintiffs*

Attorneys for Defendant

17

18 **ATTESTATION**

19 I, Aleksandr Felstiner, am the ECF User whose ID and password are being used to file
20 this document. In Compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel of
21 record for all Parties have concurred in this filing.

22

23 By: /s/Aleksandr L. Felstiner

24 Aleksandr L. Felstiner

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**[PROPOSED] ORDER GRANTING
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AMENDED COMPLAINT**

Date: January 22, 2026

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Judge: Hon. Beth Labson Freeman

[PROPOSED] ORDER

Upon review of the Parties' Joint Stipulation Granting Leave to File Second Amended

Complaint (ECF No. 44) ("Joint Stipulation"), and for good cause shown, the Court hereby

ORDERS the following:

(1) Plaintiffs are GRANTED leave to file the [Proposed] Second Amended Complaint

approved by Defendant on September 24, 2025, and attached to the Joint Stipulation;

(2) Plaintiffs SHALL file the [Proposed] Second Amended Complaint attached to the Joint

Stipulation within five days of the date of this order;

(3) Pursuant to the Court's September 23, 2025 Order (ECF No. 40), the deadline for

Defendant to file a responsive pleading to the Second Amended Complaint shall be thirty

(30) days after the Second Amended Complaint is deemed filed;

(4) In light of this Order, the oral argument scheduled for January 22, 2026 on Plaintiffs'

Motion for Leave to Amend is VACATED.

1 (5) Further, Google LLC's October 2, 2025 deadline to answer or otherwise respond to the
2 First Amended Complaint (ECF No. 8) is VACATED.

3 (6) All other scheduled dates, including the case-management dates set by the Court's
4 September 23, 2025 Order, remain in full force and effect.

5 IT IS SO ORDERED.

Dated: _____
October 3, 2025

By: 
HON. BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE